

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

JOSEPH BASKINS

Plaintiff,

V.

PATRICK GILMORE, MICHAEL R.
KELLY, MARC JAROCKI, Unknown
Chicago Police Department Employees, and
the CITY OF CHICAGO,

Defendants.

JURY TRIAL DEMANDED

MOTION FOR EXTENSION OF TIME TO FILE MOTION TO COMPEL

Plaintiff Joseph Baskins, by and through his attorneys, Loevy & Loevy, hereby moves this Court for an extension of time of thirty-five (35) days, until and including July 23, 2018, for Plaintiff to file his motion to compel discovery responses from Defendant Patrick Gilmore, should Defendant Gilmore fail to respond by that date. In support of his motion, Plaintiff states as follows:

1. Defendant Gilmore was served with Plaintiff's complaint on November 9, 2017.
(Dkt. 20.)
2. Upon Defendant Gilmore's failure to retain counsel or appear in person, the Court found him to be in default on January 9, 2018. (Dkt. 30.)
3. A copy of this order was served on Defendant Gilmore on February 11, 2018.
(Dkt. 38.)

4. Plaintiff first attempted to serve Defendant Gilmore with interrogatories and requests for production on April 23, 2018. (See Affidavit of Larry Biela, attached hereto as Exhibit A.)

5. At the June 5 status hearing, the Court set a June 18 deadline for Plaintiff's motion to compel. Dkt. 65.

6. At that time, Plaintiff's counsel believed Defendant Gilmore had been successfully served Defendant with the discovery requests.

7. Plaintiff's counsel now understands that the process server has to date, not been able to affect service. (Exhibit A.)

8. The process server has attempted service no less than thirteen times at three different addresses. (*Id.*)

9. Plaintiff has mailed a copy of his discovery requests to Defendant Gilmore, at 2812 S. Wells St. #2, Chicago, IL 60616.

10. Plaintiff requests the deadline to respond be extended thirty-five days, through July 23, 2018, in order to give Defendant Gilmore sufficient time to receive, and respond to the requests.

11. Should he fail to do so, Plaintiff requests the Court's permission to file a motion to compel no later than July 23, 2018.

Wherefore, Plaintiff Joseph Baskins respectfully requests this Court grant a 35 day extension, giving him until July 23 to move to compel Patrick Gilmore's discovery responses, should such motion be necessary.

Respectfully submitted,

/s/ Josh Loevy
Josh Loevy
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, Josh Loevy, an attorney, certify that on June 18, 2018, I caused the foregoing Motion for Extension of Time to File Motion to Compel to be filed using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Josh Loevy
Josh Loevy
Attorney for Plaintiff